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 and Defendants Thomas M. Ashburn, Carol
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 Cece, Alfred S. Chuang, William T. Coleman, Mark
 P. Dentinger, Matthew S. Green, Stewart K.P. Gross,
 William M. Klein, Ivan M. Koon, William H. Janeway,
 Joseph H. Menard, Dean Morton, Tod Nielsen,
 Edward W. Scott, Jr., Robert A. Shipp and Deborah Stanley

E-FILED - 6/27/07

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re BEA SYSTEMS, INC. DERIVATIVE)
 LITIGATION)

Master File No. C-06-4459 (RMW)

This Document Relates To:)
 All Actions)

**STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING THE FILING
 DATE FOR THE OPPOSITION
 TO THE MOTION TO DISMISS**

STIPULATION EXTENDING THE FILING
 DATE FOR THE OPPOSITION TO THE
 MOTION TO DISMISS

1 WHEREAS, on March 12, 2007, Plaintiffs filed an Amended Consolidated Complaint;
2 and

3 WHEREAS, on April 26, 2007, Nominal Defendant BEA Systems and Defendants
4 Thomas M. Ashburn, Carol A. Bartz, Barbara J. Britton, Mark T. Carges, Sam Cece, Alfred S.
5 Chuang, William T. Coleman, Mark P. Dentinger, Matthew S. Green, Stewart K.P. Gross,
6 William M. Klein, Ivan M. Koon, William H. Janeway, Joseph H. Menard, Dean Morton, Tod
7 Nielsen, Edward W. Scott, Jr., Robert A. Shipp and Deborah Stanley (collectively, "Defendants")
8 filed Motions to Dismiss the Amended Consolidated Complaint; and

9 WHEREAS, the Parties have begun to discuss the outcome of the BEA Audit Committee
10 investigation, and such discussions continue.

11 THEREFORE, the Parties stipulate, in order to facilitate such further discussions and
12 subject to the approval of the Court, to the following:

- 13 1. Plaintiffs' time to file an opposition to Defendants' Motion to Dismiss shall be
14 extended to June 22, 2007.
- 15 2. If Defendants file and serve a reply to Plaintiffs' opposition, they will do so
16 within 21 days after service of the opposition.

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18
19 DATED: June 11, 2007

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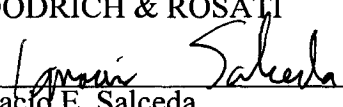
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28 STIPULATION EXTENDING THE FILING
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Robert A. Shipp and Deborah Stanley*


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* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 6/27/07



The Hon. Ronald M. Whyte
United States District Court Judge

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